

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

CIVIL ACTION NUMBER: 9:19-cv-02782-SAL

Philadelphia Indemnity Insurance Company,

Plaintiff,

v.

Richard Alexander Murdaugh, Richard  
Alexander Murdaugh, Jr. and Renee S.  
Beach, as Personal Representative of the  
Estate of Mallory Beach,

Defendants.

**CONSENT MOTION FOR EXTENSION OF  
TIME TO FILE REPLY TO PLAINTIFF'S  
RESPONSE IN OPPOSITION**

Defendants Richard Alexander Murdaugh and Richard Alexander Murdaugh, Jr., with the consent of counsel for Plaintiff, move for an Order extending the time for Defendants to file a Reply to Plaintiff's Response in Opposition (ECF 37) which was due Friday, January 29, 2021. This extension of time would extend the deadline for Defendants to file a to file a Reply to Plaintiff's Response in Opposition to Monday, February 1, 2021.

This extension request is made in good faith and not for purposes of delay, and the Court's granting of this request will not impact any other existing deadlines.

A proposed Order is attached hereto and will be submitted for consideration by email to the judge pursuant to filing preferences.

TURNER PADGET GRAHAM & LANEY, P.A.

/s/ Robert E. Kneece III

John S. Wilkerson, Federal ID No.: 4657  
Robert E. Kneece III, Federal ID No.: 12351  
40 Calhoun Street, Suite 200  
Post Office Box 22129 (29413)  
Charleston, SC 29401  
Telephone: (843) 576-2801

Facsimile: (843) 577-1649

Email: [JWilkerson@TurnerPadget.com](mailto:JWilkerson@TurnerPadget.com)  
[RKneece@TurnerPadget.com](mailto:RKneece@TurnerPadget.com)

GRIFFIN DAVIS

James M. Griffin, Federal ID No.: 1053  
4408 Forest Drive, Suite 300  
P.O. Box 999 (29202)  
Columbia, SC 29206  
Email: [jgriffin@griffindavislaw.com](mailto:jgriffin@griffindavislaw.com)

ATTORNEYS FOR DEFENDANTS RICHARD  
ALEXANDER MURDAUGH AND  
RICHARD ALEXANDER MURDAUGH, JR.

--and--

WE CONSENT:

/s/ Phillip E. Reeves  
Phillip E. Reeves (Fed ID No.: 3232)  
Jennifer E. Johnsen (Fed ID No.: 5427)  
Gallivan, White & Boyd, P.A.  
PO Box 10589  
Greenville, SC 29603  
864-271-9580  
[preeves@gwblawfirm.com](mailto:preeves@gwblawfirm.com)  
[jjohnsen@gwblawfirm.com](mailto:jjohnsen@gwblawfirm.com)

ATTORNEYS FOR PLAINTIFF